

EXHIBIT I

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF GEORGIA

3
4 CASE NUMBER: 1:21-CV-5338-ELB-SCJ-SDG

5
6 GA ST. CONF. OF NAACP, et al.,

7 Plaintiffs,

8 vs.

9 STATE OF GEORGIA, et al.,

10 Defendants.

11 * * * * *

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13
14 THE ORAL PROCEEDINGS OF THE
15 DEPOSITION OF REP. JAN JONES
16 January 17, 2023
17

18
19 REPORTER BY:

20 Paul Morse

21 Certified Court Reporter and Notary Public

22 ACCR #588 Expires 9/30/23

23 JOB No. 5667900

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1 A. I do not.

2 Q. Okay. I imagine I'm not as
3 familiar with the areas of Georgia as you are.
4 But it looks to me like these are, you know,
5 dispersed throughout the state. Is that what
6 it looks like to you?

7 A. I mean, these are -- it looks like
8 all of the population concentrations, you know,
9 the bigger cities of Georgia.

10 Q. Okay. But there was not a town
11 hall held in Cobb County. Is that right?

12 A. That's right.

13 Q. Or Gwinnett?

14 A. That's right.

15 Q. Or DeKalb?

16 A. That's right.

17 Q. And those three counties are in
18 the Atlanta Metro area?

19 A. That's right.

20 Q. Are they populous counties?

21 A. Oh yes.

22 Q. Do they have high numbers of
23 voters of color in those counties?

1 A. Certainly DeKalb does.

2 Q. And do you know if that was
3 considered in creating this town hall schedule?

4 A. No, I -- I don't know.

5 Q. In your view, should it have been
6 considered?

7 A. Should what have been considered?

8 Q. Where there were counties with
9 high populations, specifically high populations
10 of minority voters?

11 A. I mean, I don't know if I think
12 that should -- that or just high populations,
13 you know. But I assume the Chairman thought
14 that having Atlanta and Cumming, you know, was
15 adequate for the Metro area. But I didn't
16 schedule it.

17 Q. Would it surprise you to know that
18 it could take hours to travel from the edges of
19 Gwinnett to Atlanta?

20 A. It would not surprise me.

21 Q. Okay. Would you agree that
22 community voices should be part of the
23 redistricting process?

1 Q. I'd like to share my screen. Are
2 you able to see the document on the screen
3 here?

4 A. I am.

5 Q. I'm going to introduce it as Grant
6 Exhibit Number 1. It has been previously
7 produced in this litigation as LEGIS31 and 32.
8 And this is the meeting minutes from a
9 November 10 -- from a November 10, 2021 House
10 Committee meeting. Do you recognize this
11 document?

12 (Exhibit Grant 1
13 is marked for identification.)

14 A. I don't remember it. But I see it
15 now.

16 Q. Okay. So this is a committee
17 meeting, senate bill SB 1EX was introduced to
18 be put on the agenda. And the committee action
19 was voted on. Correct?

20 A. Yes.

21 Q. And --

22 A. Was this on the Senate map? I
23 can't -- I can't tell?

1 Q. Yes, so it's SB 1EX.

2 A. Okay. So the senate house map --
3 the senate -- the senate district map. Okay.

4 Q. Yes. Sorry for interrupting you.
5 Just to clear the record, that's the State
6 Senate redistricting bill. Correct?

7 A. Yes.

8 Q. Okay. And it looks like there
9 were 13 members of the committee present and
10 Representative Rich was also present. Correct?

11 A. Yes.

12 Q. So 14 in total?

13 A. Uh-huh. Yes.

14 Q. And of the people who voted,
15 eleven votes yea, including yourself. Right?

16 A. Yes.

17 Q. And two voted nay?

18 A. Yes.

19 Q. And would you agree with me that
20 this bill passed along the party line?

21 A. Yes.

22 Q. And Representative Alexander is
23 black. Correct?

1 A. Yes.

2 Q. And Representative Scott is black?

3 A. Yes.

4 Q. Okay. And removing this going to
5 the next exhibit, Grant Exhibit 2 -- do you
6 hear the echo?

7 A. Yes.

8 Q. Okay. I think that's better now.
9 So this is previously produced as LEGIS37 and
10 38. It's the meeting minutes from November 20,
11 2021.

12 (Exhibit Grant 2
13 is marked for identification.)

14 A. Uh-huh.

15 Q. The bill on the agenda was SB 2EX.
16 And that's the congressional redistricting
17 bill. Correct?

18 A. Yes.

19 Q. And here again, 14 members voted
20 on the bill. And Representative Bonnie Rich
21 was also present?

22 A. Uh-huh.

23 Q. The bill passed 10 yeas and 4

1 nays. Correct?

2 A. Yes.

3 Q. And you would agree the bill
4 passed on party lines?

5 A. Yes.

6 Q. And you would agree that all of
7 the nays are black members of the house?

8 A. Yes.

9 Q. Putting that down, these are --
10 introducing Grant Exhibit 3, this is previously
11 produced in the litigation as LEGIS29 and 30,
12 meeting minutes from November 9, 2021. House
13 Bill 1EX was on the agenda. Right?

14 (Exhibit Grant 3
15 is marked for identification.)

16 A. Yes.

17 Q. That's the State House
18 redistricting bill. Correct?

19 A. Yes.

20 Q. And it looks like all members were
21 present except for Representative Matt Dollar.
22 Right?

23 A. Yes.

1 Q. Okay. So the bill passed the
2 committee 11 yeas, 5 nays. Correct?

3 A. Yes.

4 Q. The bill passed on the party line?

5 A. Yes.

6 Q. And of the 5 nays, you would agree
7 with me that all of those are members of the
8 house that are black members. Correct?

9 A. They are black members of the
10 Democrat Party. Yes.

11 Q. Okay. I'm going to stop sharing
12 my screen. And did you meet with the minority
13 party about the majority maps before they were
14 introduced to the Committee?

15 A. No.

16 Q. Did you ever meet with the
17 minority party related to the maps that were
18 not -- that was not during the Committee
19 session?

20 A. No. That is -- that is generally
21 the Committee Chair's responsibility.

22 Q. Do you know if the Committee Chair
23 met with members of the minority party?